

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 1:18-cr-02945-WJ

SUBHANAH WAHHAJ,

Defendant.

DEFENDANTS' JOINT EXHIBIT LIST

Defendant, Subhanah Wahhaj, through counsel of record, Ryan J. Villa and Justine Fox-Young, submits the following joint exhibit list on behalf of all Defendants.¹ In addition to the specific exhibits listed below, Defendants reserve the right to offer any exhibit admitted at any pretrial hearing in this case, and the right to introduce additional exhibits subsequent to the disclosure of additional discovery and *Jencks* materials, of the government's witness and exhibit lists. Defendants also reserve the right to amend their exhibit lists in the event that any severance of defendants and/or counts is granted.

- A. Drone Video and Still Photographs Depicting Defendants' Home and Land in Amalia
- B. Photos Depicting Defendants' Home and Land in Amalia Prior to Bulldozing
- C. Photos Depicting Defendants' Home and Land after Bulldozing
- D. Videos and Still Photographs from the August 3, 2018 Raid of Defendants' Home
- E. Photographs from the August 6, 2018 Search of Defendants' Home
- F. Defendants' Family Videos from Amalia
- G. Photographs of Beecher Street and Iris Homes

¹ Defendants Jany Leveille and Hujrah Wahhaj join in this pleading. The undersigned counsel have not had the opportunity to confer with Defendants Siraj Ibn Wahhaj and Lucas Morton, who appear *pro se*, with regard to this exhibit list.

- H. Siraj Ibn Wahhaj Executive Security Training Materials
- I. Earthship Application, Financial Receipts and Building Plans
- J. Recording of Clara Mendiola
- K. Rule 1006 Summary Chart Regarding Government Surveillance
- L. Surveillance Notes
- M. Purchase and Court Documents regarding Ownership Swap of Lots 28 and 29 in Costilla Meadows
- N. Photographs of Physical Evidence
- O. Receipts for Weapon Purchases
- P. Rule 1006 Summary Chart Regarding Defendants' Financial Transactions
- Q. Documentation of the Marriage of Jany Leveille and Siraj Ibn Wahhaj
- R. Any and all Exhibits identified by the United States
- S. Any and all Exhibits later identified by any Defendants
- T. Any and all exhibits that may be revealed through subsequent discovery disclosures and/or during the course of the parties' ongoing investigation

Respectfully submitted,

/s/ Ryan J. Villa

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&

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Attorneys for Defendant Subhanah Wahhaj

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2023, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA